



Registered Nurses' Association of Ontario  
L'Association des infirmières et infirmiers  
autorisés de l'Ontario

Councillor Joe Mihevc, Chair  
Board of Health  
10th Floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Sent by email: boh@toronto.ca

July 16, 2018

**Re: HL28.2 A Public Health Approach to Drug Policy**

Dear Councillor Mihevc and members of the Board of Health,

The Registered Nurses' Association of Ontario (RNAO) commends Toronto Public Health and its leadership for its ongoing work to address the opioid poisoning crisis in Toronto. Despite the dedication and efforts of many health professionals, peer workers, and community volunteers, the death toll in Toronto continues to rise. In 2017, there were 303 opioid overdose deaths in Toronto – most of them preventable. That's a 63 per cent increase in the number of Torontonians who died compared to 2016, and a 121 per cent increase compared to 2015.<sup>1</sup> There were even more Torontonians who were treated for suspected overdoses in emergency departments. Between October 2, 2017 and July 1, 2018, there were 2,386 suspected overdose cases and 12,582 substance-related visits to hospitals across the city.<sup>2</sup>

The status quo is clearly not working. In order to address this public health emergency, RNAO supports the recommendations of Dr. Eileen de Villa, the Medical Officer of Health that:

1. The Board of Health call on the federal government to decriminalize the possession of all drugs for personal use, and scale up prevention, harm reduction, and treatment services.
2. The Board of Health call on the federal government to convene a task force, comprised of people who use drugs and policy, research, and program experts in the areas of public health, human rights, substance use, mental health, and criminal justice, to explore options for the legal regulation of all drugs in Canada, based on a public health approach.<sup>3</sup>

The evidence clearly demonstrates that criminalizing drug use is causing serious health and social harms.<sup>4</sup> Making criminals of drug users increases their risk of death by forcing them into unsafe drug practices and spaces to avoid detection and decreases access to services for those seeking assistance. These harms are disproportionately impacting people who are already marginalized, including people who are living with low-income, experiencing homelessness,

people with mental health and substance use issues, Indigenous people, people from racialized groups, women, and youth.<sup>5</sup> We all share the responsibility and consequences of further marginalizing extremely vulnerable groups.

While decriminalization may be a crucial first step, the danger will remain of unregulated drugs killing people due to contamination and unknown potency. As with other drugs such as tobacco, alcohol, and cannabis, RNAO supports legalization with strict government control and regulation based on potential for harm.

Opioid poisoning took the lives of at least 3,987 Canadians<sup>6</sup> and 1,261 Ontarians<sup>7</sup> in 2017 according to the preliminary data that is available—most of these deaths could have been prevented. Your leadership in taking a public health approach to drug policy is critical in saving lives not only in Toronto but also across our province and country.

With warmest regards,



Doris Grinspun, RN, MSN, PhD, LLD(hon), Dr(hc), O.ONT.  
Chief Executive Officer  
Registered Nurses' Association of Ontario (RNAO)

## References:

---

<sup>1</sup> Toronto Public Health (2018). *Toronto Overdose Action Plan: Status Report 2018*. Report from the Medical Officer of Health to the Board of Health, June 4, 2018, 2. Accessed July 13, 2018:

<https://www.toronto.ca/legdocs/mmis/2018/hl/bgrd/backgroundfile-116008.pdf>

<sup>2</sup> Toronto Public Health (2018). Toronto Overdose Information System. Accessed July 13, 2018:

<https://www.toronto.ca/community-people/health-wellness-care/health-inspections-monitoring/toronto-overdose-information-system/>

<sup>3</sup> Toronto Public Health (2018). *A Public Health Approach to Drug Policy*. Report from the Medical Officer of Health to the Board of Health, June 28, 2018. 1-2, Accessed July 13, 2018:

<https://www.toronto.ca/legdocs/mmis/2018/hl/bgrd/backgroundfile-118060.pdf>

<sup>4</sup> Csete, J., Kamarulzaman, A. et al. (2016). Public health and international drug policy. *Lancet*. 387 (10026), 1427-1480.

<sup>5</sup> Toronto Public Health, *A Public Health Approach to Drug Policy*, 3.

<sup>6</sup> Special Advisory Committee on the Epidemic of Opioid Overdoses (2018). *National report: Apparent opioid-related deaths in Canada*. Ottawa: Public Health Agency of Canada, June 2018.

<https://www.canada.ca/en/public-health/services/publications/healthy-living/national-report-apparent-opioid-related-deaths-released-june-2018.html>

<sup>7</sup> Toronto Public Health, *Toronto Overdose Action Plan: Status Report 2018*, 2.